

Subject: Re: CPRA request (ICEFPS.2019.07.12.a)
From: [REDACTED]
Date: 12/27/19, 11:58 AM
To: "Erica B. Klein" <eklein@hkschoollaw.com>
CC: "Richard Hansberger" <rhansberger@hkschoollaw.com>

Ms. Klein,

Rather than touting your happiness, and more than happiness, to take the additional time to inadequately mitigate a circumstance that you and your client voluntarily created, why don't you consider how happy you might be to take the additional time to comply with the CPRA at section 6253.9(a) and provide these emails in native email format as the law requires and my request specifies?

It will be more useful to me to have your scans than to have nothing at all, and if you're going to get fussy about complying with the law's explicit mandate I will be glad to have them while we continue to discuss your obligation to provide EMLs. But such a production will in no way satisfy your client's obligation and will, as far as I am concerned, certainly not close out this request.

And I object to your characterization of my disinclination to provide a physical location as a refusal. For all you know about it I don't have a physical location at which I can receive mail. I certainly don't have a physical location in which to store any random stacks of paper you choose to send to me. The CPRA at section 6253 and elsewhere requires your clients to make these records available to "any person", even those without physical locations at which mail can be received or which uncontrolled shipments of paper can be stored.

Thanks!

[REDACTED]

On Fri, Dec 27, 2019, at 11:44 AM, Erica B. Klein wrote:

[REDACTED]

My client printed out these documents so they could be reviewed by my office. I do in fact have paper copies available to be sent to you today via Priority Mail. If however, you refuse to provide a physical location, I certainly will be more than happy to take the additional time required in order to scan each document and send to you in digital format.